

Colorado Department of Health  
Hazardous Materials & Waste Management Division

Comments

on

FINAL

PHASE I RFI/RI WORK PLAN

FOR

OU-11

(West Spray Field)

ROCKY FLATS PLANT

March 16, 1992

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COMMENTS TO THE RESPONSE FOR CONDITIONALLY APPROVED FINAL WORKPLAN  
DATED MARCH 16, 1992:

Proposed Resolution 1: In Section 7.3.1 of the Workplan, the second paragraph on page 14 must be restated to clarify which specific sampling procedures will be used. This paragraph should include the following items:

1. The Rocky Flats (RF) method as outlined in EMD SOP GT.8 will be used to collect surface soil samples at the pit locations prior to excavation.
2. Vertical profile soil samples for radionuclides will be collected according to procedures outlined in EMD SOP GT.7.

Proposed Resolution 2: In Section 7.3.2, the appropriate portions of the third paragraph on page 16 must be rewritten to state that any non-radionuclide sampling will be performed consistent with EMD SOP GT.8 rather than with the proposed tube sampler.

Proposed Resolution 3: Acceptable as stated.

Proposed Resolution 4: Acceptable as stated.

Proposed Resolution 5: Acceptable as stated.

Proposed Resolution 6: The SOP being developed to cover confirmation sampling techniques should not be submitted in a

technical memorandum, but rather as an SOP. A copy of these confirmation sampling techniques should be sent to CDH and EPA prior to their implementation in the field.

Proposed Resolution 7: Benchmark tables for ground water and surface water have been reviewed by CDH and returned to DOE with comments; benchmark tables for air and soils have not yet been submitted to CDH.